Exhibit B

Courtney Mosuly

From:	Aamir Kazi
Sent:	Wednesday, September 1, 2021 3:52 PM
To:	Rich Wojcio; Corby Vowell; Susana M. Ricardo; Jon Suder; Mike Cooke; bfarnan@farnanlaw.com; Christopher O. Green; Susan Morrison; Michael J. Farnan
Cc:	McAfee/Kajeet
Subject:	RE: Kajeet v. McAfee - Request for Source Code

Hi Rich –

Your email contains a series of inaccurate assumptions and statements. It is probably more productive to have a call to discuss. We are generally free tomorrow. Please let us know a time that works.

Thank you.

Aamir Kazi :: Principal **::** Fish & Richardson P.C.

404 724 2811 direct **::** kazi@fr.com

From: Rich Wojcio <wojcio@fsclaw.com>
Sent: Tuesday, August 31, 2021 7:06 PM
To: Aamir Kazi <kazi@fr.com>; Corby Vowell <vowell@fsclaw.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: RE: Kajeet v. McAfee - Request for Source Code

Aamir-

Kajeet disagrees with your assertions that Kajeet's source code requests are "quite excessive." The source code for the accused products comprises thousands of files, of which Kajeet has requested only 85, per your count. This is hardly excessive, especially in light of McAfee's refusal to produce any further technical documentation describing the architecture and operation of the accused products to date. With regard to the directory entries, it appears you were able to find those directories within the source code and the files contained therein without difficulty. As such each has been identified in a sufficiently specific manner.

Kajeet's requests are made at the direction of its technical expert who inspected the code at your offices last week. His identification of the requested modules as being of particular importance provides good cause for Kajeet's request. It appears McAfee's responsive assertion that the requests are "excessive" or potentially irrelevant appears to be based solely on attorney opinion with no indication that the portions of the code requested have even been inspected ahead of making the present objection. Please let us know if this is incorrect.

If McAfee is refusing to produce any or all of the requested files, please let us know which specific files it is objecting to and the specific basis for each objection. Per the protective order, it is incumbent on the objecting party (McAfee) to raise its objections with the Court within ten days. To the extent there are files that McAfee does not object to

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producing, please identify those files and let us know whether they will be produced within the four day period contemplated by the Protective Order.

I am generally available tomorrow morning to discuss this matter further, if necessary. Let me know some times that work for you.

Thanks,
Richard A. Wojcio, Jr.
Attorney at Law

F | S | C

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604 East 4th Street, Suite 200 | Fort Worth, Texas 76102
Direct: 817-574-7012 | Main:817.334.0400 | Fax: 817.334.0401
Email: wojcio@fsclaw.com | Website: www.fsclaw.com

From: Aamir Kazi <kazi@fr.com>
Sent: Tuesday, August 31, 2021 2:39 PM
To: Rich Wojcio <wojcio@fsclaw.com>; Corby Vowell <vowell@fsclaw.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: RE: Kajeet v. McAfee - Request for Source Code

Rich,

We have now had an opportunity to investigate Kajeet's print request. Kajeet's request seems quite excessive, as Kajeet has requested that McAfee print nearly 1200 pages of code from 85 different files. Included in Kajeet's request is a request to print 8 directories entirely, several of which have 20+ files within them, without any effort to identify specific files in those directories. Is it really Kajeet's position that every single file in each of those directories is relevant? That does not seem plausible.

We would like to find a way to work with Kajeet here, but it looks like Kajeet did not make any effort to narrowly tailor its print request in this case, and it is not reasonable to print this much code indiscriminately.

Are you available to discuss?

Thank you.

Aamir Kazi :: Principal **::** Fish & Richardson P.C.

404 724 2811 direct **::** kazi@fr.com

From: Rich Wojcio <wojcio@fsclaw.com>
Sent: Friday, August 27, 2021 5:27 PM
To: Aamir Kazi <kazi@fr.com>; Corby Vowell <vowell@fsclaw.com>; Susana M. Ricardo <Ricardo@fr.com>; Jon Suder <jts@fsclaw.com>; Mike Cooke <mtc@fsclaw.com>; bfarnan@farnanlaw.com; Christopher O. Green <cgreen@fr.com>; Susan Morrison <morrison@fr.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Cc: McAfee/Kajeet <McAfee/Kajeet@fr.com>
Subject: Kajeet v. McAfee - Request for Source Code

[This email originated outside of F&R.]

Aamir,

Pursuant to the provisions of Paragraph 10(g) of the Protective Order entered in this case [Dkt. No. 28], Kajeet hereby requests that the source code modules listed in the attached document be produced in hard copy. Some of the items listed are individual files while others are folder locations containing more than one file. For all folder requests, Kajeet is requesting that each file contained in the identified folder be produced. In light of McAfee's producing only 22 pages of core technical documents in this case, we expect that there will be no objection from McAfee as to the reasonableness of the number of files and total pages of source code requested. Please let us know if McAfee disagrees. Please also confirm that McAfee will provide the requested documents within four business days, as the Protective Order requires. Kajeet reserves the right to make additional requests for hard copy production of source code as the case progresses.

Kajeet expects to continue its ongoing inspection of McAfee's source code, pursuant to Paragraph 10(a) of the Protective Order, in the upcoming weeks. We are coordinating with our technical expert to identify dates that are workable on our end to continue the inspection. I will follow up with firm dates once they are known. We expect that during this next inspection McAfee will have had sufficient time to now produce the source code in accordance with the requirements of the Protective Order, including providing two laptops with the source code and requested additional software (Eclipse, NetBeans) for review and an additional laptop for note taking.

Thank you,
Richard A. Wojcio, Jr.
Attorney at Law

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